IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TEXARKANA DIVISION

SABLE NETWORKS, INC. and SABLE IP, LLC,

Plaintiffs,

VS.

FORTINET, INC.,

Defendant.

Case No. 5:20-cv-00109-RWS

JURY TRIAL DEMANDED

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiffs Sable Networks, Inc. and Sable IP, LLC and Defendant Fortinet, Inc. (collectively, the "Parties") file this Joint Motion to Stay All Deadlines and Notice of Settlement. The Parties hereby notify the Court that all matters related to the case between the parties have been resolved in principle. The general terms and amount of the settlement are reflected in the email exchange filed under seal herewith as Exhibit A. The parties request that the Court stay all unreached case deadlines applicable between the Parties for thirty (30) days so the appropriate dismissal papers may be submitted to dismiss all claims between them in this action. The parties further stipulate that if any issues arise in formalizing the settlement papers, they agree to submit such issues to the Court for final resolution.

Dated: January 6, 2021 Respectfully submitted

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Counsel for Defendant Fortinet, Inc.

CERTIFICATE OF CONFERENCE

I hereby certify that Counsel for Plaintiffs and Counsel for Defendant have complied with the meet and confer requirement in Local Rule CV-7(h) regarding this Motion. The relief requested in this motion is joint.

Dated: January 6, 2021 /s/ Daniel P. Hipskind
Daniel P. Hipskind